

HEARTING DATE: MARCH 18, 2021
HEARING TIME: 10:00 A.M.

WILK AUSLANDER LLP

825 Broadway, 29th Floor
New York, New York 10019
Telephone: (212) 981-2300
Jay S. Auslander
Eric J. Snyder
Natalie Shkolnik
Julie Cilia

Counsel for Seadrill Limited and Fintech Advisory Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO, S. DE R.L.
DE C.V., *et al.*

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 18-11094 (SCC)
(Jointly Administered)

GONZALO GIL-WHITE, PERSONALLY
AND IN HIS CAPACITY AS FOREIGN
REPRESENTATIVE OF PERFORADORA
ORO NEGRO, S. DE R.L. DE C.V. AND
INTEGRADORA DE SERVICIOS
PETROLEROS ORO NEGRO, S.A.P.I. DE
C.V.

Plaintiff,

-against-

ALP ERCIL; ALTERNA CAPITAL
PARTNERS, LLC;
AMA CAPITAL PARTNERS, LLC;
ANDRES CONSTANTIN ANTONIUS-
GONZÁLEZ; ASIA RESEARCH AND
CAPITAL MANAGEMENT LTD.; CQS

Adv. Pro. No. 19-01294

(UK) LLP; FINTECH ADVISORY, INC.;
DEUTSCHE BANK MÉXICO, S.A.,
INSTITUCIÓN DE BANCA MÚLTIPLE;
GARCÍA GONZÁLEZ Y BARRADAS
ABOGADOS, S.C.; GHL INVESTMENTS
(EUROPE) LTD.; JOHN FREDRIKSEN;
KRISTAN BODDEN; MARITIME
FINANCE COMPANY LTD.; NOEL
BLAIR HUNTER COCHRANE, JR; ORO
NEGRO PRIMUS PTE., LTD.; ORO
NEGRO LAURUS PTE., LTD.; ORO
NEGRO FORTIUS PTE., LTD.; ORO
NEGRO DECUS PTE., LTD.; ORO NEGRO
IMPETUS PTE., LTD.; PAUL MATISON
LEAND, JR.; ROGER ALAN BARTLETT;
ROGER ARNOLD HANCOCK; SEADRILL
LIMITED; SHIP FINANCE
INTERNATIONAL LTD.; and DOES 1-100

Defendants.

**STATEMENT OF SEADRILL LIMITED AND FINTECH ADVISORY INC. IN
SUPPORT OF EXTENDING LITIGATION STAY FOR ADVERSARY PROCEEDING**

Sadrill Limited¹ and Fintech Advisory Inc. support the extension requested by the Foreign Representative for the reasons set forth in the statements filed by both the Foreign Representative [ECF #299] and AMA Capital Partners, LLC (“AMA”), Alterna Capital Partners, LLC, Maritime Finance Company, Ltd., Kristan Bodden, and Paul Matison Leand, Jr. [ECF # 300].²

¹ Sadrill Limited is a debtor in a proceeding under chapter 11 of the Bankruptcy Code in Case No. 21-30427 (DRJ)(Bankr. S.D. Tex.). Sadrill Limited’s filing of this Stipulation shall not be deemed to be a waiver of any right that might be asserted by Sadrill Limited in its capacity as a debtor or debtor in possession.

² Consistent with prior stipulations and orders entered by this Court to stay all deadlines in the Chapter 15 Proceedings [ECF Nos. 280, 283, 288, 290, 295], this Stipulation does not waive any of the undersigned defendants’ available defenses and objections to the Adversary Proceedings.

Dated: New York, New York
March 11, 2021

WILK AUSLANDER LLP

By: /s/ Eric J. Snyder

Jay S. Auslander

Eric J. Snyder

Natalie Shkolnik

Julie Cilia

825 Broadway, 29th Floor

New York, New York 10019

(212) 981-2300

*Counsel for Seadrill Limited and Fintech
Advisory Inc.*